See also attachments. emailed RPM copy

DEPARTMENT OF THE AIR FORCE
366th CIVIL ENGINEER SQUADRON (ACC)
MOUNTAIN HOME AFB, IDAHO

19 September 2008

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Mountain Home AFB ID 83648

Environmental Protection Agency, Region 10
Ms. Ellen Hale
Remedial Project Manager
1200 6th Ave, Ste 900
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Seattle WA 98101

Dear Ms. Hale,

I would like to address the questions you wrote in your email dated 13 Aug 08 about the asbestos management activities in our Military Family Housing (MFH) demolition and construction projects Phases 6 and 7.

On 18 Sep 07, a representative from the EPA Region 10 along with representatives from the Idaho Department of Environmental Quality (IDEQ) discovered a piece of pipe that they suspected to be transite while inspecting the Phase 6 and 7 projects areas. On 1 Nov 07, the IDEQ returned to perform their own inspection and informed the base there may be a potential asbestos transite issue in the Phases 6 and 7 project areas. After further inspection, the suspected area of concern also came to include the base's rubble disposal area Verlinde Hill. The source of the post-demolition transite fragments appears to be previously abandoned underground water lines brought to the surface during trenching operations in the Phase 6 and 7 project areas.

Prior to our notification of discovery of the transite pieces in Nov 07, soil on MFH construction sites was generally passed through a series of screens to remove rocks and debris. The screened soil was then reused as construction material on site, and the larger rocks and debris separated by the screening process were hauled to the Verlinde Hill rubble disposal area, as inert rubble. The screened soil from the Phases 6 and 7 areas was reused solely on the Phases 6 and 7 project sites.

I would now like to address the questions from your email dated 13 Aug 08:

Question 1: Has anyone inspected and sampled soils in areas where demolition and reconstruction was done in phases that came before the current work?

Response: The only releases occurred during the trenching operations where transite underground water pipes were fractured in the Phases 6 and 7 project areas, thus, no inspection or sampling of soils for asbestos were needed in the previous MFH phases. As soon as the base was notified of the disposal at Verlinde Hill, the base conducted sampling and investigations at both the Phases 6 and 7 project sites and at Verlinde Hill.

Question 2: What has happened to the piles of soil (and fine asbestos fragments) and rock (and larger transite pipe fragments) that were present in fall 2007?

Response: At the Phases 6 and 7 project sites, the larger transite pipe fragments were collected, manifested and properly disposed of at the Idaho Waste Systems (IWS) asbestos landfill. A company named Asbestos Abatement Incorporated (AAI) who is a subcontractor to the US Army Corps of Engineers (USACE) prime contractors for the two phases, executed the recovery and removal of the surface transite pieces from both phases and Verlinde Hill, with the latest recovery project being completed on 31 Jul 08. This report is included as Attachment 1. The piles of screened soil and rock (tailings) that were present in the fall of 2007 at the Phases 6 and 7 project sites were inspected and found not to contain fine asbestos fragments. Due to the possibility that these piles could contain larger transite fragments, and as a proactive and protective measure, these piles have now been hauled to the base permitted asbestos landfill for final disposition. At Verlinde Hill, the larger transite pipe fragments were collected, properly manifested by AAI and disposed of at IWS.

Question 3: What effort has been made to plan for appropriate identification and management of transite before excavation work begins on a new phase?

Response: As a result of this incident and to prevent a similar occurrence in the future, MHAFB created a Transite Working Group with the goal of addressing the proper identification of transite before excavation work, and to review its proper management. The group convened three times weekly for a period of five weeks and consisted of several local base experts along with experts from the USACE from both the local and Seattle Regional Offices. The group provided several very well thought out recommendations on how to prevent a reoccurrence of this incident, some of which include:

a) More detailed asbestos training for Quality Assurance (QA), contract inspection and on-site personnel to identify potential issues beforehand or immediately upon occurrence (executed by USACE contractors).
b) Re-looking at our current DIGLINE/Redstake procedures to find better ways to identify potential underground issues before the beginning of construction. The old hand-drawn base utilities maps do not provide a high enough degree of accuracy or a comfortable level of assurance to be considered a sole source of information. This process is currently under examination and execution.
c) Requiring more "due diligence" of contractors to pre-characterize proposed construction sites for potential issues early in the design phases of a project, and to have a pre-approved plan in place to describe the steps that will occur upon discovery of a potential environmental issue (such as transite pipe).

d) Better presentation of existing site conditions in construction design packages (revising our pre-construction checklist).

Question 4: As the asbestos could pose a risk to human health, has any effort been made to characterize that risk?

Response: The base has evaluated potential risk by characterizing the source and exposure pathway. Air sampling at the Phases 6 and 7 project sites was conducted. Thirty-two air samples were collected over two sampling days on 10 Nov 07 (no activity on site) and 12 Nov 07 (active construction on site). No detectable concentrations of fibers were found in the vast majority of the air samples, and only one sample identified the presence of a trace of fibrous material (Attachment 2, Page 1). These conditions are similar to exposure conditions expected in the housing area now. The Phases 6 and 7 project areas also have established lawns, houses, streets, and other coverings. Gardening is not allowed in the homes, and all playgrounds are covered with bark. All perimeter areas where exposed soil could remain were dry-land seeded to establish vegetation.

At Verlinde Hill, personal air breathing zone monitoring was conducted on 30 – 31 Jul 08 during recovery of the larger transite pieces. All six samples were below the OSHA Permissible Exposure Limit (PEL), and five of them were at non-detectable levels (Attachment 1, Page 3). Thus, our characterization of the potential source and exposure pathways leads to our characterization of risk.

but very poor at communication

The USAF and USACE take resident and worker safety seriously and have managed potential asbestos-containing soils conservatively. From the date we were notified that transite pieces were on the surface in the Phases 6 and 7 project areas on 1 Nov 07, we have implemented new trenching techniques, collection methods, contract management approaches, and addressed piles of soil as though they have the potential to have an asbestos fiber component to them.

We understand and share your intent to protect human health and the environment and to ensure compliance with CERCLA. We are working with the utmost concern for our airmen, and ourselves beings we also personally spend a significant portion of our lives working on this base. We invite you to visit and tour the Phases 6 and 7 project sites and Verlinde Hill to see the situation first-hand. Please let us know if you would like to visit.

If you have any questions, please contact me at (208) 828-1684, or Ms. Paula Jo Brown at (208) 828-6666, or Mr. Rick Roller at (208) 828-6667.

Sincerely,

CURTIS OHLSEN
Chief, Environmental Compliance

Attachments:

1. *Air Monitoring Report – MHAFB – Verlinde Hills Cleanup,* 1 Aug 08.
2. *Report of the Evaluation of Transite Chip Issues MHAFB – Phase VI – VII Mountain Home, Idaho,* November 10 – 12, 2007